

1 Keith C. Owens (Bar No 184841)  
2 Nicholas A. Koffroth (Bar No. 287854)  
3 **FOX ROTHSCHILD LLP**  
4 10250 Constellation Blvd., Suite 900  
5 Los Angeles, CA 90067  
6 Telephone: (310) 598-4150  
7 Facsimile: (310) 556-9828  
8 kowens@foxrothschild.com  
9 nkoffroth@foxrothschild.com

6 *Counsel for Official Committee of Unsecured*  
7 *Creditors*

8 **UNITED STATES BANKRUPTCY COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**  
10 **SANTA ANA DIVISION**

10 In re:

11 THE LITIGATION PRACTICE GROUP,  
12 P.C.,

14 Debtor.

Chapter 11

Case No. 8:23-bk-10571-SC

**STATUS REPORT OF THE OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS CONCERNING MORNING  
LAW GROUP, P.C.**

**[No Hearing Currently Requested]**

1 The Official Committee of Unsecured Creditors (the “Committee”) of The Litigation Practice  
2 Group P.C. (the “Debtor”), in the above-referenced bankruptcy case (the “Bankruptcy Case”) pending  
3 under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”)<sup>1</sup> hereby submits this  
4 status report in connection with the Court’s request to the Morning Law Group, P.C. (“MLG”)  
5 concerning the status of the sale, payment of the related purchase price, and timing related thereto.  
6 In support of this status report, the Committee respectfully states as follows:

7 **STATUS REPORT**

8 On May 15, 2024, the Court held a status conference in the Bankruptcy Case. At the status  
9 conference, the Court requested, through the Court-appointed monitor, Nancy Rapaport, that MLG  
10 file a status report concerning, among other things, the status, timing, and amount of payments owing  
11 under that certain *Agreement of Purchase and Sale and Joint Escrow Instructions* [Docket No. 416]  
12 (the “APA”) approved by the Court, pursuant to that certain order [Docket No. 352] (the “Sale  
13 Order”).

14 On May 29, 2024, MLG filed the status report [Docket No. 1259] in response to the Court’s  
15 request. The Committee reserves all rights with respect to the MLG status report. The Committee  
16 has learned of potential disputes concerning the APA, the estimation of payments under the APA,  
17 and timing issues related to such payments. The Committee’s efforts to obtain further clarity on these  
18 disputes informally have not been fruitful but remain ongoing.

19 On May 29, 2024, the Committee served on MLG a notice of demand for certain financial  
20 information necessary to compute payments and timing under the APA, pursuant to § 2(b) of the APA  
21 and as consistent with the covenants and representations set forth in § 12(p) and (q) of the APA.  
22 Pursuant to § 2(b) of the APA, MLG has five business days to respond to the request for information,  
23 *i.e.*, June 5, 2024, and provides that the Court shall be the sole forum for resolution of any dispute  
24 related thereto. The Committee fully expects that MLG will comply with the request. Nevertheless,  
25 in the interest of completeness, the Committee reserves all rights to bring any dispute concerning such  
26 disclosures before the Court on an emergency basis following the conclusion of the responsive  
27

28 <sup>1</sup> Unless otherwise noted, all references to “Section” or “§” refer to a section of the Bankruptcy Code.

1 deadline under the APA, subject to any responses or objections interposed by MLG.

2 The Committee intends to keep the Court apprised of any relevant developments, as  
3 appropriate.

4 **CONCLUSION**

5 The information requested of MLG by the Court and the Committee remains essential to a  
6 complete understanding of potential recoveries in this Bankruptcy Case. The Committee remains  
7 supportive of the efforts of MLG to continue providing services to certain of the Debtor's former  
8 clients and expects prompt and administratively efficient clarification, disclosure, and resolution of  
9 any dispute arising under the APA. The Committee will supplement this status report as appropriate  
10 and reserves all rights.

11 Respectfully submitted on this 31<sup>st</sup> day of May, 2024.

12  
13 **FOX ROTHSCHILD LLP**

14 By: /s/ Nicholas A. Koffroth  
15 Keith C. Owens (Bar No. 184841)  
16 Nicholas A. Koffroth (Bar No. 287854)  
17 Constellation Place  
18 10250 Constellation Blvd., Suite 900  
19 Los Angeles, California 90067  
20 *Counsel for the Committee*  
21  
22  
23  
24  
25  
26  
27  
28

FOX ROTHSCHILD LLP  
10250 Constellation Boulevard, Suite 900  
Los Angeles, California 90067  
(310) 598-4150  
(310) 556-9828 (fax)

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 10250 Constellation Boulevard, Suite 900, Los Angeles, CA 90067.

A true and correct copy of the foregoing documents entitled: STATUS REPORT OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS CONCERNING MORNING LAW GROUP, P.C. on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On 5/31/2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Bradford Barnhardt bbarnhardt@marshackhays.com, bbarnhardt@ecf.courtdrive.com, alinares@ecf.courtdrive.com
- Eric Bensamochan eric@eblawfirm.us, G63723@notify.cincompass.com
- Michael Jay Berger michael.berger@bankruptcypower.com, yathida.nipha@bankruptcypower.com; michael.berger@ecf.inforruptcy.com
- Ethan J Birnberg birnberg@portersimon.com, reich@portersimon.com
- Peter W Bowie peter.bowie@dinsmore.com, caron.burke@dinsmore.com
- Ronald K Brown ron@rkbrownlaw.com
- Christopher Celentino christopher.celentino@dinsmore.com, caron.burke@dinsmore.com
- Shawn M Christianson cmcintire@buchalter.com, schristianson@buchalter.com
- Randall Baldwin Clark rbc@randallbclark.com
- Leslie A Cohen leslie@lesliecohenlaw.com, jaime@lesliecohenlaw.com; clare@lesliecohenlaw.com
- Michael W Davis mdavis@dtolaw.com, ygodson@dtolaw.com
- Anthony Paul Diehl anthony@apdlaw.net, Diehl.AnthonyB112492@notify.bestcase.com, ecf@apdlaw.net
- Jenny L Doling jd@jdl.law, dolingjr92080@notify.bestcase.com; 15994@notices.nextchapterbk.com; jdoling@jubilee bk.net
- Daniel A Edelman dedelman@edcombs.com, courtecl@edcombs.com
- Meredith Fahn fahn@sbcglobal.net
- William P Fennell william.fennell@fennelllaw.com, luralene.schultz@fennelllaw.com; wpf@ecf.courtdrive.com; hala.hammi@fennelllaw.com; naomi.c walinski@fennelllaw.com; samantha.larimer@fennelllaw.com
- Alan W Forsley alan.forsley@flpllp.com, awf@fklawfirm.com, awf@fl-lawyers.net, addy@flpllp.com
- Marc C Forsythe mforsythe@goeforlaw.com, mforsythe@goeforlaw.com; dcyrankowski@goeforlaw.com
- Jeremy Freedman jeremy.freedman@dinsmore.com, nicollette.murphy@dinsmore.com
- Eric Gassman erg@gassmanlawgroup.com, gassman.ericb112993@notify.bestcase.com
- Christopher Ghio christopher.ghio@dinsmore.com, nicollette.murphy@dinsmore.com; angelica.urena@dinsmore.com; deamira.romo@dinsmore.com
- Amy Lynn Ginsburg efilings@ginsburglawgroup.com
- Eric D Goldberg eric.goldberg@dlapiper.com, eric-goldberg-1103@ecf.pacerpro.com
- Jeffrey I Golden jgolden@go2.law, kadele@ecf.courtdrive.com; cbmeeker@gmail.com; lbracken@wglp.com; dfitzgerald@go2.law; gol den.jeffreyi.b117954@notify.bestcase.com
- Richard H Golubow rgolubow@wghlawyers.com, jmartinez@wghlawyers.com; svillegas@wghlawyers.com

- Mark Mark Good mark@markgood.com
- David M Goodrich dgoodrich@go2.law,  
kadele@go2.law;dftzgerald@go2.law;wgglp@ecf.courtdrive.com
- D Edward Hays ehays@marshackhays.com,  
ehays@ecf.courtdrive.com;alinares@ecf.courtdrive.com;cmendoza@marshackhays.com;cmendoz  
a@ecf.courtdrive.com
- Alan Craig Hochheiser ahochheiser@mauricewutscher.com, arodriguez@mauricewutscher.com
- Garrick A Hollander ghollander@wghlawyers.com,  
jmartinez@wghlawyers.com;svillegas@wghlawyers.com
- Brian L Holman b.holman@musickeeler.com
- Richard L. Hyde rhyde@awglaw.com
- Peter L Isola pisola@hinshawlaw.com, rmojica@hinshawlaw.com,iking@hinshawlaw.com
- Razmig Izakelian razmigizakelian@quinnemanuel.com
- Sara Johnston sara.johnston@dinsmore.com
- Sweeney Kelly kelly@ksgklaw.com
- Joon M Khang joon@khanglaw.com
- Ira David Kharasch ikharasch@pszjlaw.com
- Meredith King mking@fsl.law, ssanchez@fsl.law;jwilson@fsl.law
- Nicholas A Koffroth nkoffroth@foxrothschild.com, khoang@foxrothschild.com
- David S Kupetz David.Kupetz@lockelord.com, mylene.ruiz@lockelord.com
- Christopher J Langley chris@slclawoffice.com,  
langleycr75251@notify.bestcase.com;ecf123@casedriver.com;john@slclawoffice.com
- Kelli Ann Lee Kelli.lee@dinsmore.com, kristy.allen@dinsmore.com
- Matthew A Lesnick matt@lesnickprince.com,  
matt@ecf.inforuptcy.com;jmack@lesnickprince.com
- Daniel A Lev daniel.lev@gmlaw.com, cheryl.caldwell@gmlaw.com;dlev@ecf.courtdrive.com
- Britteny Leyva bleyva@mayerbrown.com,  
2396393420@filings.docketbird.com;KAWhite@mayerbrown.com;ladoCKET@mayerbrown.com
- Marc A Lieberman marc.lieberman@flpllp.com, safa.saleem@flpllp.com,addy@flpllp.com
- Michael D Lieberman mlieberman@lipsonneilson.com
- Yosina M Lissebeck Yosina.Lissebeck@Dinsmore.com, caron.burke@dinsmore.com
- Mitchell B Ludwig mbl@kpclegal.com, kad@kpclegal.com
- Daniel S March marchlawoffice@gmail.com, marchdr94019@notify.bestcase.com
- Kathleen P March kmarch@bkylawfirm.com, kmarch3@sbcglobal.net,kmarch@sbcglobal.net
- Mark J Markus bklawr@bklaw.com,  
markjmarkus@gmail.com;markus.markj.r112926@notify.bestcase.com
- Richard A Marshack (TR) pkraus@marshackhays.com, ecf.alert+Marshack@titlexi.com
- Laila Masud lmasud@marshackhays.com,  
lmasud@ecf.courtdrive.com;lbuchanan@marshackhays.com;alinares@ecf.courtdrive.com
- Sarah S. Mattingly sarah.mattingly@dinsmore.com
- William McCormick Bill.McCormick@ag.tn.gov
- Kenneth Miskin Kenneth.M.Miskin@usdoj.gov
- Byron Z Moldo bmoldo@ecjlaw.com, aantonio@ecjlaw.com,dperez@ecjlaw.com
- Glenn D. Moses gmoses@venable.com,  
cascavone@venable.com;ipmalcolm@venable.com;jadelgado@venable.com
- Jamie D Mottola Jamie.Mottola@dinsmore.com, jhanawalt@ecf.inforuptcy.com
- Alan I Nahmias anahmias@mbn.law, jdale@mbn.law
- Victoria Newmark vnewmark@pszjlaw.com
- Jacob Newsum-Bothamley jacob.bothamley@dinsmore.com,  
angelica.urena@dinsmore.com;deamira.romo@dinsmore.com
- Queenie K Ng queenie.k.ng@usdoj.gov
- Israel Orozco israel@iolawcorp.com
- Keith C Owens kowens@foxrothschild.com, khoang@foxrothschild.com
- Lisa Patel lpatel@lesnickprince.com, jmack@lesnickprince.com;jnavarro@lesnickprince.com

- Michael R Pinkston rpinkston@seyfarth.com, jmcdermott@seyfarth.com, sfocalendar@seyfarth.com, 5314522420@filings.docketbird.com, bankruptcydocket@seyfarth.com
- Douglas A Plazak dplazak@rhlaw.com
- Tyler Powell tyler.powell@dinsmore.com, jennifer.pitcock@dinsmore.com; rosetta.mitchell@dinsmore.com
- Daniel H Reiss dhr@lnbyg.com, dhr@ecf.inforuptcy.com
- Ronald N Richards ron@ronaldrichards.com, 7206828420@filings.docketbird.com
- Vanessa Rodriguez vanessa.rodriguez@dinsmore.com, angelica.urena@dinsmore.com
- Kevin Alan Rogers krogers@wellsmar.com
- Gregory M Salvato gsalvato@salvatoboufadel.com, calendar@salvatolawoffices.com; jboufadel@salvatoboufadel.com; gsalvato@ecf.inforuptcy.com
- Olivia Scott olivia.scott3@bclplaw.com
- Jonathan Serrano jonathan.serrano@dinsmore.com
- Maureen J Shanahan Mstotaro@aol.com
- Paul R Shankman PShankman@fortislaw.com, info@fortislaw.com
- Zev Shechtman Zev.Shechtman@saul.com, zshechtman@ecf.inforuptcy.com; easter.santamaria@saul.com
- Jeffrey M Singletary jsingletary@swlaw.com, rmckay@swlaw.com
- Leslie Skorheim leslie.skorheim@usdoj.gov
- Adam D Stein-Sapir info@pflc.com
- Howard Steinberg steinbergh@gtlaw.com, pearsallt@gtlaw.com; NEF-BK@gtlaw.com; howard-steinberg-6096@ecf.pacerpro.com
- Andrew Still astill@swlaw.com, kcollins@swlaw.com
- Michael R Totaro Ocbkatty@aol.com
- United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov
- William J Wall wwall@wall-law.com
- Sharon Z. Weiss sharon.weiss@bclplaw.com, raul.morales@bclplaw.com, REC\_KM\_ECF\_SMO@bclplaw.com
- Johnny White JWhite@wrslawyers.com, jlee@wrslawyers.com
- Reina Zepeda rzepeda@omniagnt.com

**2. SERVED BY UNITED STATES MAIL:** On 5/31/2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows.

Debtor

The Litigation Practice Group P.C.  
17542 17th St., Suite 100  
Tustin, CA 92780

**See attached for additional parties**

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on 5/31/2024, I served the following persons and/or entities by personal delivery, mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

The Honorable Scott C. Clarkson  
United States Bankruptcy Court, Central District of California  
411 West Fourth Street, Suite 5130 / Courtroom 5C  
Santa Ana, CA 92701-4593

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

5/29/2024

Kimberly Hoang

/s/ Kimberly Hoang

Date

Printed Name

Signature

**Additional Parties Served by U.S. Mail**

**Creditors who have the 20 largest unsecured claims**

Debt Validation Fund II, LLC  
5075 Lower Valley Road,  
Atglen, PA 19310

MC DVI Fund 1, LLC; MC  
DVI Fund 2, LLC  
598 Cottonwood Dr.,  
Glenview, IL 60026

Validation Partners LLC  
1300 Sawgrass Pkwy, Ste. 110  
Sunrise, FL 33323

Marich Bein LLC  
99 Wall Street, Ste 2669  
New York, NY 10005

Business Centers of America  
1100 Sir Francis Drake Blvd,  
Ste 1, Kentfield, CA 94904

JP Morgan Chase  
3 Park Plaza, Ste 900  
Irvine, CA 92614

CA Franchise Tax Board  
PO Box 942857  
Sacramento, CA 94257-0511

Outsource Accelerator Ltd  
City Marque Limited  
Unit 8801-2 Bldg. 244-248  
Des Voeux Rd.  
Central Hong Kong

Collaboration Advisors  
400 Dorla Court  
Zephyr Cove, NV 89448

Anthem Blue Cross

1 PO Box 511300  
2 Los Angeles, CA 90051-7855

3 Azevedo Solutions Groups, Inc.  
4 420 Adobe Canyon Rd.  
5 Kenwood, CA 95452

6 Debt Pay Pro  
7 1900 E Golf Road, Suite 550  
8 Schaumburg, IL 60173

9 Sharp Business Systems  
10 8670 Argent St  
11 Santee, CA 92071

12 Tustin Executive Center  
13 1630 S Sunkist Steet, Ste A  
14 Anaheim, CA 92806

15 Exela Enterprise Solutions  
16 2701 E. Grauwyler Road  
17 Irving, TX 75061

18 Netsuite-Oracle  
19 2300 Oracle Way  
20 Austin, TX 78741

21 Credit Reporting Service Inc  
22 548 Market St, Suite 72907  
23 San Francisco, CA 94104-5401

24 Document Fulfillment Services  
25 2930 Ramona Ave #100  
26 Sacramento, CA 95826

27 Executive Center LLC  
28 5960 South Jones Blvd  
Las Vegas, NV 89118

LexisNexus  
15500 B Rockfield Blvd  
Irvine, CA 92618

**Secured Creditors**

Diverse Capital LLC  
323 Sunny Isles Blvd., Suite 503  
Sunny Isles, FL 33154

City Capital NY  
1135 Kane Concourse  
Bay Harbour Islands, FL 33154



1 Counsel for secured creditor Fundura Capital Group  
Mitchell B. Ludwig  
2 Knapp, Petersen & Clarke  
550 North Brand Blvd., Suite 1500  
3 Glendale, CA 91203

4 Counsel for Debt Validation Fund II, LLC,  
MC DVI Fund 1, LLC, and MC DVI Fund 2, LLC  
5 Barry Cappello  
David L. Cousineau  
6 Cappello Noel LLP  
831 State Street  
7 Santa Barbara, CA 93101

8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28